

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DZHOKHAR TSARNAEV

No. 13-10200-GAO

**MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS TO
MOTIONS TO SUPPRESS PHYSICAL EVIDENCE UNDER SEAL**

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file certain exhibits to his motions to suppress physical evidence – specifically, FBI reports, search warrant applications, and the search warrants themselves - under seal.

As grounds therefor, undersigned counsel state that the documents are not part of the public record, refer to investigative information, and are covered by the protective order in this case. DE #91.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

/s/ Miriam Conrad

Judy Clarke, Esq.
California Bar: 76071
CLARKE & RICE, APC
1010 Second Avenue, Suite 1800
San Diego, CA 92101
(619) 308-8484

David I. Bruck, Esq. (SC Bar # 967)
220 Sydney Lewis Hall
Lexington, VA 24450
(540) 460-8188

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 7, 2014. .

/s/ Miriam Conrad